

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

**JOINT MOTION FOR THIRD EXTENSION OF BRIEFING SCHEDULE REGARDING
APPELLATE ATTORNEYS' FEES**

On November 16, 2021, the Court granted the parties' first joint motion requesting an extension of the briefing schedule relating to Private Plaintiffs' request for appellate attorneys' fees—Private Plaintiffs' Motion for Appellate Attorneys' Fees due December 10, 2021, Defendants' Response due January 7, 2021, and Private Plaintiffs' Reply due January 28, 2022. *See* Briefing Order (Doc. 1244).

Since the entry of that Order, the parties requested a second extension of the briefing schedule by four weeks, to account for the holiday season and the parties' continued good faith negotiations as to the fee award. On December 9, 2021, the Court granted the parties' request, setting an amended briefing schedule: Private Plaintiffs' Motion for Appellate Attorneys' Fees due January 7, 2021, Defendants' Response due February 4, 2022, and Private Plaintiffs' Reply due February 25, 2022. *See* Briefing Order (Doc. 1250).

Over the past month, the parties have continued to work diligently to negotiate a resolution. To that end, the parties, in good faith, have agreed in principle as to the amount of the appellate

fee award, subject to memorialization of that agreement. The parties, therefore, request a further two-week extension of the time to file their attorneys' fees application:

Private Plaintiffs' Motion for Appellate Attorneys' Fees: Due January 21, 2022

Defendants' Response: Due February 18, 2022

Private Plaintiffs' Reply: Due March 11, 2022

Date: January 7, 2022

Respectfully submitted,

/s/ Lindsey B. Cohan

JON M. GREENBAUM
EZRA D. ROSENBERG
BRENDAN B. DOWNES
Lawyers' Committee for
Civil Rights Under Law
1500 K Street, N.W., Suite 900
Washington, D.C. 20005

WENDY WEISER
The Brennan Center for Justice at NYU Law School
120 Broadway, Suite 1750
New York, New York 10271

SIDNEY S. ROSDEITCHER
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, New York 10019-6064

LINDSEY B. COHAN
Dechert LLP
515 Congress Avenue, Suite 1400
Austin, Texas 78701

NEIL STEINER
DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797

JOSE GARZA
Law Office of Jose Garza
7414 Robin Rest Drive
San Antonio, Texas 98209

DANIEL GAVIN COVICH
Covich Law Firm LLC
802 N Carancahua, Ste 2100
Corpus Christi, Texas 78401

GARY BLEDSOE
Potter Bledsoe, LLP
316 W. 12th Street, Suite 307
Austin, Texas 78701

VICTOR GOODE
NAACP
4805 Mt. Hope Drive
Baltimore, Maryland 21215

ROBERT NOTZON
The Law Office of Robert Notzon
1502 West Avenue
Austin, Texas 78701

*Counsel for the Texas State Conference of NAACP
Branches and the Mexican American Legislative
Caucus of the Texas House of Representatives*

/s/ Leah Aden
SHERRILYN IFILL
JANAI NELSON
LEAH C. ADEN
DEUEL ROSS
NAACP Legal Defense and Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006

JONATHAN PAIKIN
KELLY P. DUNBAR
TANIA FARANSSO
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006

Counsel for Imani Clark

/s/ Chad W. Dunn

CHAD W. DUNN
K. SCOTT BRAZIL
BRAZIL & DUNN
4407 Bee Caves Road
Building 1, Suite 111
Austin, TX 78746

J. GERALD HEBERT
DANIELLE M. LANG
Campaign Legal Center
1101 14th St. NW, Suite 400
Washington, DC 20005

ARMAND G. DERFNER
Derfner & Altman
575 King Street, Suite B
Charleston, SC 29403

NEIL G. BARON
Law Office of Neil G. Baron
914 FM 517 W, Suite 242
Dickinson, Texas 77539

DAVID RICHARDS
Richards, Rodriguez & Skeith, LLP
816 Congress Avenue, Suite 1200
Austin, Texas 78701

Counsel for Veasey/LULAC Plaintiffs

LUIS ROBERTO VERA, JR.
Law Office of Luis Roberto Vera Jr.
111 Soledad, Ste 1325
San Antonio, TX 78205

Counsel for LULAC

/s/ Rolando L. Rios

ROLANDO L. RIOS
115 E. Travis, Suite 1645
San Antonio, Texas 78205

*Counsel for the Texas Association of Hispanic
County Judges and County Commissioners*

/s/ Robert W. Doggett

ROBERT W. DOGGETT
Texas RioGrande Legal Aid
4920 N. IH-35
Austin, Texas 78751

JOSE GARZA
SUSAN ZINN
Texas RioGrande Legal Aid
1111 N. Main Ave.
San Antonio, Texas 78212

*Counsel for Lenard Taylor, Eulalio Mendez Jr.,
Lionel Estrada, Estela Garcia Espinoza, Margarito
Martinez Lara, Maximina Martinez Lara, and La
Union Del Pueblo Entero, Inc.*

AND

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN COWLES
Attorney General for Civil Litigation

THOMAS A. ALBRIGHT
Chief for General Litigation Division

/s/ Christopher D. Hilton

CHRISTOPHER D. HILTON
Attorney-in-Charge
Texas Bar No. 24087727
Deputy Division Chief
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

Counsel for State Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Lindsey B. Cohan
Lindsey B. Cohan
Dechert LLP
515 Congress Avenue, Suite 1400
Austin, Texas 78701
lindsey.cohan@dechert.com